

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
Unimex Corporation,)	Case No. 20-12535-BFK
Debtor.)	Chapter 11
<hr/>)	
)	
Jolene E. Wee, Plan Trustee of Unimex)	
Corporation,)	
Plaintiff,)	
v.)	Adv. Proc. No. 22-01058-BFK
)	
Weiwei Jian,)	
Defendant.)	
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NOTICE OF MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT

PLEASE TAKE NOTICE that Robert M. Marino, Esq., and the law firm of Redmon Peyton & Braswell, LLP (collectively, “Movant”), pursuant to Local Rule 2090-1(G), has filed papers (specifically that certain *Motion for Leave to Withdraw as Counsel for Defendant* (the “Motion”)) requesting the entry of an Order granting Movant leave to withdraw as counsel of record for Weiwei Jian (“Jian”), the defendant in the above-captioned adversary proceeding. A copy of the *Motion*, with a proposed *Order*, is attached to this *Notice*.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this adversary proceeding. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then on or before **May 23, 2023 (the “Response Deadline”)**, which is fourteen days after the date of service of this Notice and the Motion, you or your attorney must:

- ◇ File with the Court, at the following address, Clerk of Court, United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 South Washington Street, Alexandria, Virginia 22314, a written response and request for hearing, as required by Local Rule 2014-1. **Unless a written response and request for hearing is filed and served by the Response Deadline, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date noted above.
- ◇ You must also mail a copy to the persons listed below:

Robert M. Marino, Esq.
Redmon Peyton & Braswell LLP
510 King Street, Suite 301
Alexandria, Virginia 22314

If you or your attorney do not take any of the foregoing steps by the Response Deadline, the court may decide that you do not oppose the relief sought in the *Motion* and may enter an order granting that relief.

Dated: May 9, 2023

Respectfully Submitted,

/s/ Robert M. Marino
Robert M. Marino, Esq. VSB#26076
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Alexandria, VA 22314
Phone: 703-879-2676 (Direct)
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Email: rmmarino@rpb-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of May, 2023, I caused a true and correct copy of the foregoing *Notice* to be sent electronically through the electronic case filing system to all persons entering their appearance in this adversary proceeding and by email and/or first class mail, postage prepaid, as indicated below, to the following persons:

Weiwei Jian
20904 Butterwood Falls Terrace
Sterling, Virginia 20165
Email: weiwei.jian@gmail.com

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/s/Robert M. Marino
Robert M. Marino